



MEMO ENDORSED

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June 18, 2020

VIA ECF & EMAIL

The Honorable Valerie Caproni
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 443
New York, New York 10007

Re: *QED LLC, et al. v. Faber Daeufer & Itrato, P.C, et al.*
Case No. 20-cv-2767 (VEC)(SLC)
Joint Request to Adjourn Initial Pretrial Conference

Your Honor,

As you are aware, this firm represents Defendants Faber Daeufer & Itrato PC, Kenneth Itrato, and David Nicolaisen ("Defendants") in this matter. We write with the consent of counsel for all parties pursuant to Your Honor's Individual Rules of Practice 2.A and 2.C to respectfully request that this Court adjourn the Initial Pretrial Conference currently scheduled for June 26, 2020.

The adjournment request is made in good faith as it will allow the parties time to more fully complete the briefing of the currently pending motion to dismiss, which will be fully submitted on July 29, 2020. Defendants submit that the motion to dismiss may narrow the issues and claims in this matter, and, therefore, narrow the issues in discovery. In the interest of efficiency, Defendants believe that a brief adjournment would provide the Court with adequate time to consider these matters. Plaintiffs do not object to this request. This is the first adjournment request made with respect to the Initial Pretrial Conference.

Accordingly, we respectfully request that the Initial Pretrial Conference be adjourned to July 17, 2020 or as soon thereafter as the Court can accommodate the parties.

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We greatly appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Daniel Gold

Daniel Gold

CC: All Counsel via ECF.

Application GRANTED in part. The initial pretrial conference scheduled for June 26, 2020 is canceled. The parties' proposed case management plan will be entered separately.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

6/19/2020